



BHARTI AIRTEL (USA) LIMITED

Via Electronic ECFS Filing

March 1, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W, Suite TW-A325
Washington, DC 20554

RE: CPNI Certification, EB-06-36

Dear Ms. Dortch:

Pursuant to section 64.2009(e) of the Commission's rules¹ and the Commission's *Public Notice*, DA 08-171, dated January 29, 2008 in the above-captioned matter, Bharti Airtel (USA) Limited, hereby submits its compliance certificate and a statement explaining how the Company's operating procedures ensure compliance with these regulations.

By the attached Certificate, I hereby certify to the Commission that Bharti Airtel (USA) Limited has established, and strictly follows, policies and operating procedures to fully comply with section 64.2009 of the Commission's rules governing Customer Proprietary Network Information ("CPNI").

Bharti Airtel (USA) Limited has established strict policies, which expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees that may have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. Bharti Airtel (USA) Limited's parent corporation follows this same procedure. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require my approval, as the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

Questions regarding this matter may be directed to me.

Sincerely,
Bharti Airtel (USA) Limited

Rakesh Khurmi
Vice President
Attachment

¹ 47 C.F.R. §64.2009(e).